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February 13, 2012

FCC Mall Room

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Suite TW-A325 Washington, D.C. 20554

RE:

EB Docket No. 06-36

Annual CPNI Certification

Dear Ms. Dortch:

Attached is the annual CPNI certification filing covering the year 2011 pursuant to 47 C.F.R. Section 64.2009(e), for Great Plains Long Distance, Inc.

Sincerely,

Molly Meeves

Manager Special Services

Attachment

cc:

Best Copy and Printing, Inc.

445 12<sup>th</sup> Street Suite CY-B402

Washington, D.C. 20554

Email: FCC@BCPIWEB.COM

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## Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template

## EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009 covering the prior calendar year 2010

1. Date filed: February 6, 2012

2. Name of company(s) covered by this certification: Great Plains Long Distance, Inc.

3. Form 499 Filer ID: 803124

4. Name of signatory: Wyman Nelson

5. Title of signatory: Vice President

6. Certification:

I, Wyman Nelson, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47. C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

Attachments:

Accompanying Statement explaining CPNI procedures

Explanation of actions taken against data brokers (if applicable)

Summary of customer complaints (if applicable)

## Great Plains Communications Statement Explaining CPNI Procedures

Great Plains Long Distance, Inc. (the "Company") has implemented procedures to ensure that it is compliant with Part 64 of Title 47 of the Code of Federal Regulations, Subpart U – Customer Proprietary Network Information (CPNI), §64.2001 through §64.2011. These procedures include, but are not limited to, the following:

- Appointment of a CPNI Compliance Officer as a central point of contact for anyone (internally or
  externally) with questions about CPNI. The Compliance Officer is responsible for ensuring that
  employees are trained, as well as, making sure that the Company is in compliance with all of the
  CPNI requirements.
- Personnel training on a regular or as-needed basis that includes, but is not limited to, when
  employees are and are not authorized to use CPNI. The detail of the training can differ based on
  the employee's specific job within the Company and whether or not the employee has access to
  CPNI.
- Establishment of a disciplinary process for improper use of CPNI which is reviewed with employees and kept in a permanent Company file.
- Establishment of a process for providing customers with the CPNI notification and for requesting approval to use CPNI. The status of a customer's CPNI approval is prominently displayed as soon as the customer's account is accessed so that employees can readily identify customers that have restricted the use of their CPNI. The Company will notify the FCC within five business days of any instance where the opt-out mechanism did not work properly, to such a degree that consumer's inability to opt-out is more than an anomaly. The Company will maintain a record of the notification and the approval or disapproval record for a minimum of one year.
- Establishment of a supervisory review process for any marketing campaign by the Company or any of its affiliates. The Compliance Officer must review the campaign and all materials to ensure that it is in compliance with the CPNI rules. The Company will maintain a record of any marketing campaign, and the record will include the specific CPNI that was used in the campaign and what products and services were offered as part of the campaign. The Company will retain the record for a minimum of one year.
- Establishment of an authentication process for both call detail and non-call detail information to
  ensure that no CPNI is disclosed until the customer has been appropriately authenticated.
- Establishment of a process that allows the Company to promptly notify customers whenever a change (password, online account, address of record, etc.) is made to a customer's account.
- Implementation of a system to report breaches to the USSS and the FBI no later than seven business days after determination of the breach. A record of any breach will be retained for a minimum of two years.
- Filing of a CPNI compliance certification signed by an officer with the FCC by March 1 of each year for data pertaining to the previous calendar year.
- The Company's CPNI procedures include reasonable measurers to discover and protect against
  activity that is indicative of pretexting or any type of unauthorized access to CPNI. Employees
  are instructed to notify the CPNI Compliance Officer immediately of any suspicious activity.